

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,	)	CRIMINAL NO. 05-10115-JLT
Plaintiff,	)	
	)	
v.	)	<b>VIOLATIONS:</b>
	)	
1. JOSE MORALES,	)	21 U.S.C. §§ 846 and
a/k/a Juan Rivera,	)	841(a)(1) - Conspiracy
a/k/a "Gordo,"	)	to Distribute Heroin
a/k/a "Melvin,"	)	
2. LUIS MORALES,	)	21 U.S.C. §§ 841(a)(1) and
a/k/a "Gallito,"	)	(b)(1)(C) - Possession With
3. JOSE LUIS FIGUEROA-RAMOS,	)	Intent to Distribute Heroin
a/k/a Wilfredo Ofarrill,	)	
a/k/a "Nelson,"	)	21 U.S.C. §§ 841(a)(1) and
a/k/a "Sonny,"	)	860 - Distribution of Heroin
4. DIXON PEREZ,	)	Within 1,000 Feet of a School
a/k/a "Nelson,"	)	Zone and 100 Feet of a Video
a/k/a "Mario,"	)	Arcade
5. JOSE NICHOLSON,	)	
a/k/a "Jaiva,"	)	21 U.S.C. § 841(a)(1) -
6. ROBERT MEDEIROS,	)	Distribution of Heroin
a/k/a "Bobby,"	)	
7. MIGUEL CASADO,	)	8 U.S.C. § 1326(a) - Unlawful
a/k/a "Chulo,"	)	Entry After Deportation
8. HERMAN M. MELO,	)	
9. BRIAN P. KEENAN,	)	18 U.S.C. § 2 - Aiding and
10. DAVID R. ROSANINA,	)	Abetting
11. WILFREDO TORRES,	)	
a/k/a "Willow,"	)	21 U.S.C. § 853
12. LUIS D. SOUCLAT,	)	(Criminal Asset Forfeiture)
a/k/a "Junito,"	)	
13. WILBERTO BATISTA,	)	
a/k/a Rafael Acevedo,	)	
a/k/a Teodore Andujar,	)	
a/k/a "Vinicio,"	)	
14. JOSE ORTIZ-PEREZ,	)	
a/k/a Carlos Ruben	)	
Cruz-DeJesus,	)	
a/k/a "Jhonny,"	)	
Defendants.	)	

**UNITED STATES' BILL OF PARTICULARS  
FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney,  
Michael J. Sullivan, United States Attorney for the District of

Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

The Forfeiture Allegation of the Indictment seeks the forfeiture, pursuant to 21 U.S.C. § 853, and as a result of the offenses alleged in Counts One through Seventeen of the Indictment, of (1) any and all property constituting, or derived from, any proceeds the said defendant obtained, directly or indirectly, as a result of the charged offense; and (2) any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense, including, but not limited to, the following:

- (a) \$10,000 in United States currency, deposited in support of a bail bond at the Dartmouth House of Corrections on or about August 5, 2004, for DIXON PEREZ;
- (b) \$2,000 in U.S. Currency, seized on or about March 30, 2005, in Providence, Rhode Island, from a grey Jeep Cherokee bearing Rhode Island registration AC-833, and registered in the name of JOSE FIGUEROA, 36 Chad Brown Street, Providence, Rhode Island;
- (c) \$1,500 in U.S. Currency, seized on or about March 30, 2005, from 105 Dora Street, Apartment No. 2, Providence, Rhode Island;
- (d) \$4,145 in U.S. Currency, seized on or about March 30, 2005, from 52 Nancy Street, Apartment No. 5, Providence, Rhode Island;
- (e) \$18,100 in United States currency, seized on or about March 31, 2005, from 341 Orchard Street, New Bedford, MA;
- (f) \$2,485 in U.S. currency, seized on or about March 31, 2005, from HERMAN MELO, Jr., at St. Luke's Hospital in New Bedford, Massachusetts;

- (g) \$24,571 in U.S. currency, seized on or about March 31, 2005, from 12 Violet Street, Apartment No. 1, Providence, Rhode Island; and
- (h) \$1,081 in U.S. currency, seized from DIXON PEREZ in Providence, Rhode Island, on or about March 31, 2005.

In addition to the above-named assets, the United States intends to forfeit the following, based on the Forfeiture Allegation of the Indictment:

- (i) \$40,500.00 in United States Currency, seized on or about April 7, 2005, from a Safe Deposit Box located at Citizens Bank, 606 Dartmouth Street, Dartmouth, Massachusetts, held in the name of BRIAN P. KEENAN.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/ Jennifer H. Zacks  
NEIL J. GALLAGHER  
LISA M. ASIAP  
JENNIFER H. ZACKS  
Assistant U.S. Attorneys  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100

Dated: June 1, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon E. Peter Parker, Esquire, One Commercial Wharf North, Second Floor, Boston, Massachusetts 02110, as counsel for Brian Keenan.

/s/ Jennifer H. Zacks  
Jennifer H. Zacks  
Assistant U.S. Attorney

Dated: June 1, 2005